

201-15735

December 17, 2004

USPS Certified Mail, Return Receipt Requested

Mr. Mike Leavitt, Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

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Re: HPV Challenge
Isodecyl Diphenyl Phosphate
CAS Registry Number 29761-21-5

Dear Administrator Leavitt:

As part of Ferro Corporation's commitment under EPA's High Production Volume (HPV) Challenge Program, Ferro is pleased to submit its REVISED testing approach for Isodecyl Diphenyl Phosphate. This submission consists of this cover letter, a Test Plan, and robust summaries for the existing studies available on Isodecyl Diphenyl Phosphate. This submission is also being sent electronically to the following e-mail addresses:

oppt.ncic@epa.gov
chem.rtk@epa.gov

Ferro appreciates the assistance from USEPA for locating and providing copies of a number of studies on this chemical. This has allowed us to assemble a collection of studies that covers all but one toxicological study for Isodecyl Diphenyl Phosphate. In sum, we propose one physical chemistry test and one *in vitro* toxicological study on Isodecyl Diphenyl Phosphate to complete the HPV battery of tests.

Ferro understands that this submission will be posted on the Internet. Thank you for your cooperation in this matter. If EPA requires any additional information about this submission, please contact me at 216-750-6696 or olsona@ferro.com.

Sincerely,

Alan J. Olson, P.E
Director of Technology
Ferro Performance Chemicals Group

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